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**Via e-Mail**

Mr. John Sagone  
Office of General Counsel  
Illinois Commerce Commission  
160 North LaSalle Street - Suite C-800  
Chicago, IL 60601-3104  
[jsagone@icc.illinois.gov](mailto:jsagone@icc.illinois.gov)

**Re: ICC Workshop - e-Tariff Electronic Filing System**

Dear Mr. Sagone:

Commonwealth Edison Company ("ComEd") has reviewed Staff's Second Workshop Comments along with its Second Draft of the proposed rules for the e-Tariff Electronic Filing System. We appreciate the consideration Staff has given to the parties' feedback in the first round of comments and we welcome this opportunity to provide additional feedback. At this time, ComEd has only one substantive comment, which is detailed below and was raised in our first set of comments, and a few minor redlines to clarify and further align the rule with Section 255 of the Commission's rules. A redlined version of the draft rule reflecting ComEd's feedback is enclosed herewith as Attachment A.

**Comment 1.** ComEd's proposed redlines to paragraph (e) in the Submission of Tariffs Electronically section are to address concerns raised by stakeholders regarding the timing of filings and when they may be accepted. The rule as currently drafted allows for the possibility of a mismatch between the dates on the tariff documents submitted by the utility and what would actually be the filing and effective dates. The recommended language also clarifies the responsibilities of the public utility.

**Section XXX.XX      Submission of Tariffs Electronically**

- e) In order for an electronically submitted tariff to be considered filed on a particular date, it must be accepted by the ICC Chief Clerk's Office before five o'clock p.m. (5:00 p.m. local Illinois time) on such date. It is the responsibility of the public utility to ensure that its submission is made in such a manner that acceptance of the submission by the ICC Chief Clerk's Office for filing occurs on the date that is shown on the applicable tariff documents the public utility submitted for filing.

Mr. John Sagone  
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Thank you again for the opportunity to comment on the draft rule and we look forward to further discussions. ComEd reserves the right to supplement and amend its comments throughout the workshop process and any subsequent proceeding.

Sincerely,

/s/Bradley R. Perkins  
Bradly R. Perkins,  
Assistant General Counsel

BRP:cbo  
Enclosure